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Attorneys for Plaintiffs
**HIDDEN EMPIRE HOLDINGS, LLC;
HYPER ENGINE, LLC; AND DEON
TAYLOR; AND THIRD-PARTY
DEFENDANT ROXANNE TAYLOR**

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

HIDDEN EMPIRE HOLDINGS,
LLC; a Delaware limited liability
company; HYPER ENGINE, LLC; a
California limited liability company;
DEON TAYLOR, an individual,

Plaintiffs,

vs.

DARRICK ANGELONE, an
individual; AONE CREATIVE LLC,
formerly known as AONEE
ENTERTAINMENT LLC, a Florida
limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Defendants.

CASE NO.: 2:22-cv-06515-MWF-AGR
(Hon. Michael W. Fitzgerald, Dept. 5A)

JOINT EXHIBIT LIST

Complaint Filed: September 12, 2022
Trial Date: January 13, 2026

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Exhibit No.	Description	Date Identified	Date Admitted
1.	2012 Agreement HEFG LLC and AOne		
2.	12/03/12 email between V. Sykes and D. Angelone		
3.	12/10/14 email between R. Taylor and D. Angelone		
4.	12/10/14 email between D. Angelone and R. Taylor		
5.	10/13/15 email between GoDaddy.com and R. Taylor		
6.	10/13/15 email between R. Taylor and D. Angelone		
7.	05/08/18 email between D. Angelone and R. Taylor		
8.	07/06/18 email between R. Taylor and D. Angelone		
9.	Invoices for domain renewal fees		
10.	07/19/18 email between R. Taylor and D. Angelone		
11.	04/22/2022 email between R. Taylor and D. Angelone		
12.	12/14 email between R. Taylor and D. Angelone		

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13.	10/22/15 email between R. Taylor and D. Angelone		
14.	09/06/22 HEFG Instagram and Twitter posts		
15.	Excerpt from marketing dec for "Fear" film.		
16.	Screenshots of the characters from the Fear.game website		
17.	Longview News Journal article regarding Fear game		
18.	Printout from D. Angelone's Instagram page		
19.	09/20/19 email exchange involving D. Angelone		
20.	08/11/22 email between R. Taylor, JT Fox and D. Thompson		
21.	08/22/22 text messages between D. Angelone and R. Taylor		
22.	Emails between R. Taylor and HEFG's accountants		
23.	8/22/22 text messages between R. Taylor and D. Angelone		

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24.	08/22 email from D. Thompson		
25.	08/11/22 email between D. Taylor, JT Fox and D. Thompson		
26.	Google Return No. 25783578		
	10/27/22 Correspondence between Google and R. Taylor		
27.	11/01/22 correspondence between Google and R. Taylor		
28.	11/08/22 correspondence between Google and R. Taylor		
29.	September 28, 2022 D. Angelone declaration		
30.	Admin console and Google audit logs		
31.	Documents produced by Charter Communications		
32.	Documents produced by Twitter		
33.	10/05/22 correspondence between D. Angelone and E. Burke		
34.	10/07/22 email correspondence between D.		

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	Angelone and E. Burke		
35.	10/11/22 email correspondence between D. Angelone and E. Burke		
36.	10/13/22 email correspondence between E. Burke and D. Angelone		
37.	08/06/21 email between D. Angelone and Q. Newell		
38.	08/02/22 email from R. Taylor to D. Angelone		
39.	08/03/22 email from D. Angelone to R. Taylor		
40.	08/03/22 email from D. Taylor to D. Angelone		
41.	08/03/22 email from D. Angelone to D. Taylor		
42.	08/04/22 email from D. Taylor to D. Angelone		
43	08/04/22 email from D. Thompson to Q. Newell		
44	08/04/22 email from Q. Newell to D. Thompson		
45.	08/04/22 email from Q. Newell to D. Thompson		
46.	08/08/22 email from Q. Newell to D. Thompson		
47.	08/09/22 email from D. Taylor to D. Angelone		
48.	08/09/22 email from D. Angelone to D. Taylor		
49.	08/09/22 email from Q. Newell to D. Angelone		

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50.	08/09/22 email from Q. Newell to D. Angelone		
51.	08/9/22 email from D. Angelone to Q. Newell		
52.	08/09/22 emails between Q. Newell and D. Angelone		
53.	08/16/22 email from Google to HEFG		
54.	Detailed Record View U.S. Copyright Office Public Records System		
55.	08/11/22 email from D. Taylor to D. Angelone		
56.	08/22/23 article by Jacky Jasper: "Deon Taylor Exposed: The 'Fake Friend' in Jamie Foxx's Scandalous Post"		
57.	YouTube video – Director Deon Taylor Chimes in on Jada Smith's Toxicity & Will Smith and Chris Rock's Masculinity		
58	Hyper Engine, LLC Articles of Incorporation		
59	FTI Invoices		
60	Erin Burke Invoices		
61	Namecheap Production		
62	Documents produced by Google		
63	Operating Agreement of Social Distance LLC		

64.	Judgment by Default By Court in Berman v. Comeau et al, LASC Case No. BC509496		
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DEFENDANT'S EXHIBITS

EX No.	DESCRIPTION	IDENTIFIED	ADMITTED
100.	6/29/2009 Whaley v. Hooks/Deon Taylor case filings alleging breach of fiduciary duty and fraud in an investor/partner dispute.		
101.	8/13/2010 Phifer v. Deon Taylor/DTE/HEFG pleadings alleging breach of contract, fraud, conversion, and trademark/intellectual property claims.		
102.	5/13/2011 Potter v. Deon Taylor/DTE/NBF cross-complaint and related agreements concerning consulting/employment and alleged contract breaches.		
103.	6/10/2011 Rapton v. Deon Taylor entities complaint and abstract of judgment		

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	involving claims for fraud and contract damages in excess of \$200,000.		
104.	6/24/2011 Vail v. Vista Taylor complaint alleging fraudulent-transfer and conspiracy claims relating to alleged asset transfers.		
105.	9/20/2011 email regarding initial LMAO web platform terms, including discussion of equity share and platform terms.		
106.	12/1/2011 NSLC v. Deon and Roxanne Taylor complaint and judgment relating to a commercial lease dispute with personal guarantees and monetary judgment.		
107.	4/26/2012 signed AOne–HEFG LMAO/website development agreement and addendum describing scope of work, deliverables, and budget.		
108.	7/9/2012 email from Velma		

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	regarding a late deposit and anticipated timing of payment.		
109.	7/15/2012 email from Deon Taylor stating apology for delayed payment and addressing timing of funds.		
110.	7/16/2012 status email from Darrick Angelone regarding AOne's work on the HEFG website and pending client approvals.		
111.	8/9/2012 status email from Deon Taylor concerning "final payment" for website work and expressing appreciation for AOne's patience.		
112.	8/9/2012 email from Velma estimating that funds will be available "no later than Monday" and addressing payment timing.		
113.	8/14/2012 check from Supremacy the Movie LLC to AOne in the amount of \$3,000, bearing Roxanne		

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	Taylor's signature.		
114.	8/20/2012 email from Deon Taylor discussing completion and close-out of website work performed by AOne.		
115.	9/1/2012 LMAO Allstar Comedy Series business plan and 24-month budgets provided to AOne.		
116.	12/3/2012 email chain in which Darrick Angelone requests server access with Velma and Deon copied regarding website administration.		
117.	12/3/2012 email from Velma providing access credentials at Deon Taylor's direction.		
118.	3/19/2013 AOne invoice in the amount of \$10,000 for the final website balance.		
119.	3/19/2013 email from Roxanne Taylor directing that the HEFG website be taken offline.		
120.	3/19/2013 email from		

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	Darrick Angelone offering website training and assistance in transitioning control.		
121.	3/26/2013 email from Darrick Angelone confirming that the HEFG website is offline and that backend access is available through AOne.		
122.	5/20/2013 AOne invoice in the amount of \$12,500 for HEFG/LMAO website work.		
123.	6/12/2013 email from Deon Taylor to Darrick Angelone discussing a proposed equity interest for Angelone in the LMAO project.		
124.	8/21/2013 email from Deon Taylor to Darrick Angelone regarding potential new projects and continued collaboration.		
125.	9/24/2013 2Smart Entertainment v. HEFG/Deon Taylor/Roxanne Taylor		

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	complaint asserting contract and misrepresentation-related claims in excess of \$200,000.		
126.	9/30/2013 email from Roxanne Taylor requesting FTP assistance for HEFG website access.		
127.	10/1/2013 email from Darrick Angelone transmitting FTP credentials and instructions for HEFG website access.		
128.	10/1/2013 email from Darrick Angelone stating that he does not manage or have access to HEFG's domain registrar or email server.		
129.	10/1/2013 email from Roxanne Taylor acknowledging that the hiddenempirefilmgroup.com domain expired.		
130.	10/22/2013 email from Deon Taylor to Roxanne Taylor instructing that online work		

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	with AOne be closed out.		
131.	10/27/2013 email from Darrick Angelone describing that a three-month website contract extended to approximately 19 months and addressing project delays.		
132.	10/27/2013 email from Deon Taylor acknowledging past-due payments and commenting on Darrick Angelone's work.		
133.	11/18/2013 email from Roxanne Taylor requesting a meeting to discuss website updates.		
134.	12/4/2013 email from Roxanne Taylor explaining that email issues caused delay in sending requested website changes.		
135.	11/12/2014 Okoro v. Deon Taylor/HEFG complaint, memorandum of understanding, and related emails concerning alleged		

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	investor-related claims including fraud, conversion, and nonpayment.		
136.	12/10/2014 email from Darrick Angelone explaining that the HEFG website is hosted on HEFG servers and that AOne has design files and a May 2014 database backup.		
137.	12/10/2014 email from Roxanne Taylor stating that she allowed the HEFG domain to expire and that it was subsequently acquired by another party.		
138.	12/10/2014 email from Roxanne Taylor requesting from Darrick Angelone the website file needed to restore the site.		
139.	12/11/2014 email confirming that AOne registered the hiddenempirefilms.com domain for HEFG.		
140.	12/22/2014 email from Darrick Angelone providing		

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	full cPanel and email credentials and setup instructions for hiddenempirefilms.com.		
141.	2/3/2015 email thread regarding device configuration for HEFG email accounts and related IT support.		
142.	2/9/2015 email regarding configuration and setup of Velma's HEFG email account.		
143.	8/20/2015 email from Darrick Angelone to Roxanne Taylor explaining email server management and cPanel functions.		
144.	8/20/2015 email from Roxanne Taylor requesting access to Deon Taylor's emails in order to send messages on his behalf.		
145.	9/1/2015 email from Roxanne Taylor seeking assistance from Darrick Angelone in accessing		

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	HEFG email accounts, with cPanel instructions.		
146.	10/13/2015 Namecheap order showing registration by AOne of hiddenempirefilmgroup.com and meettheblacksthemovie.com domains.		
147.	11/20/2015 email from Deon Taylor expressing interest in a Meet the Blacks mobile game concept proposed by AOne.		
148.	12/29/2015 email chain describing HEFG email and server access, cPanel settings, ports, and troubleshooting steps.		
149.	12/29/2015 emails from Roxanne Taylor requesting password reset for an email account due to a forgotten password.		
150.	1/27/2016 email setting out Meet the Blacks deal memo terms between HEFG and		

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	AOne relating to the film marketing campaign.		
151.	3/28/2016 complaint in Richmond v. Deon Taylor, Roxanne Taylor, and DTE regarding a \$1.2 million promissory note and related claims for fraud and conversion.		
152.	8/21/2016 email regarding HEFG business status and potential marketing-company partnership discussions involving Angelone and the Taylors.		
153.	9/7/2016 email from AOne to HEFG regarding a past-due balance and outstanding invoices.		
154.	9/28/2016 Namecheap order summary reflecting renewal of the meettheblacksthemovie.com and hiddenempirefilmgroup.com domains by AOne.		
155.	10/3/2016 email regarding		

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	past-due payments and proposed marketing-company partnership arrangements.		
156.	12/7/2016 deal memorandum between Deon Taylor/HEFG and Sean Merrick concerning HSK digital media assets.		
157.	12/12/2016 email from Deon Taylor responding to a payment demand and stating he will address unpaid invoices.		
158.	1/31/2017 fully executed HSK Digital Media Asset Sales Agreement between AOne and Sean Merrick.		
159.	2/7/2017 email between Angelone and the Taylors regarding HSK acquisition issues and partnership-related questions.		
160.	2/8/2017 email thread regarding HSK and Fameolous equity terms and a requirement to release		

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	rights.		
161.	2/24/2017 fully executed agreement documenting the sale of HSK digital media assets from AOne to HEFG.		
162.	4/24/2017 email regarding HSK publishing partnership terms, revised agreements, and a 70/30 revenue split.		
163.	5/17/2017 text message exchange in which Deon Taylor refers to the social media budget in connection with “our company” and Angelone.		
164.	8/17/2017 email from AOne to HEFG transmitting a past-due payment demand and attached invoices for HEFG, Meet the Blacks, and Supremacy projects.		
165.	8/19/2017 text message in which Deon Taylor states “We’re building a company!!” in relation to work with Angelone.		
166.	8/19/2017 text message in		

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	which Deon Taylor states “Build a 100 million dollar company!” regarding business plans with Angelone.		
167.	9/13/2017 Namecheap auto- renewal invoice for HEFG and Meet the Blacks domains paid by AOne.		
168.	10/9/2017 text message from Deon Taylor referencing “3 years... still at it” in relation to ongoing work with Angelone.		
169.	10/18/2017 Google Workspace “Welcome” email for the hiddenempirefilmgroup.com domain listing darrick@ as administrator.		
170.	10/23/2017 email from Angelone creating a hiddenempirefilmgroup.com email account for Omar Joseph.		
171.	11/1/2017 email confirming Google Workspace billing		

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	for hiddenempirefilmgroup.com set up through AOne.		
172.	11/2/2017 email from AOne outlining proposed \$20,000- per-month service scope for HEFG digital and marketing services.		
173.	11/16/2017 email between Roxanne Taylor and Angelone itemizing Traffik digital marketing costs.		
174.	11/29/2017 email from Roxanne Taylor proposing a discussion about company structure and a bank account for referred clients.		
175.	12/6/2017 text message in which Deon Taylor assigns Angelone responsibility for Optimad/Alabama political social media spending.		
176.	1/10/2018 email from Roxanne Taylor requesting creation of email forwarders for multiple HEFG email accounts.		

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1	177.	1/16/2018 email transmitting		
2		AOne's 2018 HEFG annual		
3		digital budget proposal.		
4	178.	1/17/2018 email from		
5		Lionsgate/Code Black (Jeff		
6		Clanagan) concerning wage		
7		garnishment and an AOne		
8		payment dispute.		
9	179.	1/30/2018 email exchange		
10		regarding revised 2018		
11		budget projections and		
12		partnership arrangements		
13		with Velma.		
14	180.	1/31/2018 email from		
15		Roxanne Taylor requesting		
16		creation of a Google		
17		Workspace account for		
18		Damien Douglas.		
19	181.	2/2/2018 email from		
20		Angelone recommending		
21		HEFG transition to Google		
22		Workspace tools for brand		
23		management.		
24	182.	2/2/2018 email documenting		
25		setup of		
26		roxanne@hiddenempirefilm		
27		group.com, including		
28				

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	administrative access credentials.		
183.	2/2/2018 Google Workspace welcome emails for Roxanne Taylor, Velma, and Omar for hiddenempirefilmgroup.com accounts.		
184.	2/8/2018 email from AOne to Velma, Deon, and Roxanne regarding past-due managed-services fees and reimbursement of advertising spend.		
185.	2/13/2018 email from Angelone explaining per-user Google Workspace billing and the impact of additional HEFG users on AOne's costs.		
186.	2/22/2018 email from Roxanne Taylor directing AOne to create corporate email accounts for Robert Smith and Omar.		
187.	2/22/2018 email confirming creation of deon@hiddenempirefilmgro		

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	up.com with administrative credentials.		
188.	2/24/2018 email discussing the 2018 HEFG budget and proposed Hyper Engine equity structure.		
189.	2/25/2018 demand email from Kathleen Warden regarding unpaid nanny wages and related judgment.		
190.	2/26/2018 draft Hyper Engine presentation deck identifying Deon Taylor, Roxanne Taylor, and Darrick Angelone as company executives.		
191.	2/28/2018 email addressing Hyper Engine LLC entity structure and website development planning.		
192.	3/1/2018 first executed Hyper Engine LLC Operating Agreement setting forth partnership, management, and equity allocations.		
193.	3/1/2018 email exchange		

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	among Deon, Roxanne, and Darrick regarding revisions to the Hyper Engine presentation deck.		
194.	3/1/2018 California Secretary of State filing for Hyper Engine LLC submitted by Velma.		
195.	3/2/2018 email from Hyper Engine pitching digital marketing services to a prospective client.		
196.	3/5/2018 email confirming hyperengine.ai email forwarding for Darrick, Deon, and Roxanne.		
197.	3/5/2018 email discussing a potential new Hyper Engine client opportunity.		
198.	3/6/2018 email exchanges concerning Hyper Engine joint venture arrangements and payment invoice processing.		
199.	3/14/2018 email from Roxanne Taylor directing deletion or hiding of the		

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	info@hiddenempirefilmgroup.com catch-all email address.		
200.	3/22/2018 email from AOne to Velma demanding payment of the March 2018 invoice and identifying outstanding balances.		
201.	3/29/2018 email from AOne to HEFG personnel regarding February 2018 invoice payment status.		
202.	3/30/2018 email from AOne to Velma and Deon Taylor transmitting revised February and March 2018 invoices and advertising-spend advance details.		
203.	3/30/2018 email from Velma stating she forgot her Google Workspace password and requesting assistance.		
204.	4/23/2018 emails regarding setup of a Google Workspace email account for Ali Lyons under the HEFG		

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1		domain.		
2	205.	5/2/2018 email from AOne		
3		to HEFG personnel attaching		
4		more than \$70,000 in		
5		outstanding invoices for		
6		HEFG, Meet the Blacks,		
7		advertising purchases, and		
8		hosting services.		
9				
10	206.	5/21/2018 email regarding		
11		creation of a Google		
12		Workspace account for		
13		Destanye Baldwin under the		
14		HEFG domain.		
15	207.	5/21/2018 Hyper Engine		
16		team meeting calendar		
17		invitation including		
18		Roxanne, Velma, and		
19		public-relations participants.		
20	208.	5/21/2018 email from AOne		
21		to HEFG personnel		
22		regarding past-due invoices		
23		and AOne's credit-card		
24		charges for project expenses.		
25	209.	6/5/2018 email from Shandra		
26		requesting creation of a		
27		Google Workspace account		
28		for Shawn Edwards under		

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	the HEFG domain.		
210.	7/17/2018 email confirming setup of the Google Workspace account shawn@hiddenempirefilmgroup.com.		
211.	7/19/2018 email from AOne proposing a \$59,000 settlement to resolve outstanding invoices between AOne and HEFG.		
212.	8/8/2018 Google Workspace password-reset notice for Ali's account initiated by administrator Darrick Angelone.		
213.	8/10/2018 emails regarding setup of the Google Workspace account rtaylor_asst@hiddenempirefilmgroup.com for Destanye.		
214.	8/24/2018 Google Workspace password-reset notices for Suzanne's account.		
215.	8/27/2018 Namecheap virtual private server (VPS)		

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	order confirmation for HEFG website hosting paid by AOne.		
216.	8/28/2018 email between Deon Taylor and Darrick Angelone regarding Gillum campaign digital strategy and related wire-transfer information.		
217.	9/10/2018 email thread describing Hyper Engine capabilities and proposed targeting strategy for the Proposition 10 campaign.		
218.	9/11/2018 email from AOne to HEFG personnel regarding a payment demand for invoices described as approximately two years old.		
219.	9/11/2018 email from Velma stating that approximately \$800,000 has been awarded for the Proposition 10 campaign and requesting a Hyper Engine proposal.		
220.	9/15/2018 Namecheap order confirmation for registration		

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	of bewoke.vote and related domains billed to AOne.		
221.	9/15/2018 email among Roxanne, Darrick, Robert Smith, and public-relations personnel regarding Be Woke trademark searches and naming options.		
222.	9/16/2018 email confirming setup of the Google Workspace account james@hiddenempirefilmgroup.com.		
223.	9/21/2018 email from AOne to Roxanne describing Be Woke and Hyper Engine digital-media strategy and media plans.		
224.	9/25/2018 email from Deon Taylor discussing potential changes to the Hidden Empire Film Group name in light of domain and trademark issues.		
225.	11/7/2018 Google Workspace migration notice for HEFG email accounts		

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	reflecting migration to G Suite administered by AOne.		
226.	11/8–11/12/2018 Google Workspace password-reset notices for accounts including Damien, Suzanne, Velma, Karen, Omar, and others.		
227.	11/10/2018 Google Workspace password-reset notices for Deon Taylor and other HEFG staff accounts.		
228.	11/11–December 2018 Google Workspace password-reset notices for accounts including Sean and Shandra.		
229.	11/15, 11/20, 11/27, and 12/6/2018 Google Workspace password-reset notices for Shawn and Karen.		
230.	12/12/2018 Namecheap VPS auto-renewal notice for server1.hiddenempirefilmgroup.com billed to AOne.		
231.	12/12/2018 Google		

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	Workspace password-reset notice for Ryan's account.		
232.	12/17/2018 Google Workspace password-reset notice for Deon Taylor's account.		
233.	2/4/2019 email summarizing HEFG, Be Woke, and Hyper Engine team call, including digital-strategy items led by Darrick Angelone.		
234.	2/15/2019 email regarding development of a Hyper Engine presentation deck and project list among executive-team members.		
235.	2/23/2019 Google Workspace password-reset notice for Greg Wise's account.		
236.	3/19/2019 Google Workspace password-reset notice for Omar's account.		
237.	4/8/2019 email stating that Hyper Engine clients will receive access to a PSA content vault.		

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1	238.	6/6/2019 Google Workspace		
2		password-reset notice for the		
3		generic “Office” account.		
4	239.	7/2/2019 and 7/8/2019		
5		Google Workspace		
6		password-reset notices for		
7		Roxanne Taylor’s account.		
8	240.	7/23/2019 United States		
9		Patent and Trademark Office		
10		registration record for the		
11		“Hidden Empire” trademark		
12		issued to Chalant Phifer.		
13	241.	8/14/2019 email from Sony		
14		executive Yvonne Abt		
15		seeking to connect with		
16		Hyper Engine and Darrick		
17		Angelone regarding the film		
18		“Black and Blue.”		
19	242.	8/16/2019 Namecheap		
20		renewal confirmations for		
21		multiple Be Woke-related		
22		domains billed to AOne.		
23	243.	8/16/2019 email from Hyper		
24		Engine outlining proposed		
25		pricing and billing structure		
26		for digital-marketing		
27		services.		
28				

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1	244.	8/16/2019 email from		
2		Roxanne Taylor to Marian		
3		Koltai describing Hyper		
4		Engine and the parties'		
5		marketing-company		
6		relationship.		
7	245.	8/16/2019 and 8/17/2019		
8		emails from Velma		
9		summarizing Hyper Engine		
10		operating-agreement terms		
11		and equity percentages.		
12	246.	9/4/2019 email thread among		
13		Sony executive Yvonne Abt,		
14		Hyper Engine, and HEFG		
15		representatives regarding a		
16		proposed \$75,000 influencer		
17		campaign for "Black and		
18		Blue."		
19	247.	9/6/2019 Google Workspace		
20		password-reset notice for		
21		Omar's account.		
22	248.	9/10/2019 email from		
23		Darrick Angelone to Sony		
24		confirming key performance		
25		indicators and pricing terms		
26		for the "Black and Blue"		
27		campaign.		
28				

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1	249.	9/10/2019 internal email		
2		regarding brainstorming and		
3		strategy for the Sony “Black		
4		and Blue” proposal.		
5	250.	9/10/2019 email confirming		
6		final terms of the agreement		
7		between Hyper Engine and		
8		Sony for the “Black and		
9		Blue” digital-marketing		
10		campaign.		
11	251.	9/11/2019 email from Velma		
12		attaching Hyper Engine		
13		operating agreement and		
14		EIN relating to entity status.		
15	252.	9/18/2019 email from Deon		
16		introducing the Hyper		
17		Engine team, including		
18		Angelone, to Warner Bros.		
19		regarding the Motherless		
20		Brooklyn project.		
21	253.	9/21/2019 email from		
22		Roxanne regarding opening		
23		a Hyper Engine Bank of the		
24		West account, including		
25		signature cards and wire		
26		information.		
27	254.	9/21/2019 email regarding		
28				

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	issuance of debit cards for Deon, Roxanne, and Darrick on the Hyper Engine bank account.		
255.	9/30/2019 internal email regarding Black & Blue campaign deliverables and Darrick's request for updates.		
256.	9/30/2019 email correspondence with Sony regarding Black & Blue campaign deliverables.		
257.	10/1/2019 email providing a Hyper Engine campaign update to Sony, including influencer metrics and execution details.		
258.	10/2/2019 email transmitting a Hyper Engine Motherless Brooklyn one-sheet and discussing requested campaign budget.		
259.	10/4/2019 Hyper Engine proposal outlining digital marketing services for the Mutha brand.		

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1	260.	10/11/2019 email		
2		correspondence with Warner		
3		Bros. marketing regarding		
4		the Motherless Brooklyn		
5		campaign.		
6	261.	10/15/2019 coordination		
7		emails between Warner		
8		Bros. and Hyper Engine		
9		regarding campaign logistics		
10		and influencer planning.		
11	262.	10/18/2019 email from		
12		Roxanne regarding AONE's		
13		tracking of Black & Blue		
14		influencer posts.		
15	263.	10/23/2019 email		
16		transmitting a Hyper Engine		
17		invoice and bank wire		
18		instructions to Sony.		
19	264.	10/23/2019 email		
20		correspondence with Sony		
21		regarding payment		
22		coordination and wiring		
23		details for a Hyper Engine		
24		LLC invoice.		
25	265.	10/25/2019 email from		
26		Roxanne directing that work		
27		and invoicing be processed		
28				

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	through Hyper Engine.		
266.	10/25/2019 email discussing Hyper Engine margin and agency fee structure for the Black History in Two Minutes project.		
267.	10/27/2019 Namecheap receipt for VPS hosting renewal for hiddenempirefilmgroup.com.		
268.	11/4/2019 email from Roxanne to attorney Christopher Fry describing Hyper Engine ownership structure and equity split.		
269.	11/25/2019 email from Velma proposing revised Hyper Engine operating agreement terms, including asset ownership and agency fee split.		
270.	11/26/2019 Hyper Engine check in the amount of \$4,600 to Stable Bags from an HEFG account.		
271.	11/27/2019 Namecheap receipt for HEFG hosting		

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	renewal billed to AONE.		
272.	12/1/2019 fully executed 2019 Hyper Engine Operating Agreement reflecting ownership and management terms.		
273.	12/10/2019 email regarding setup of a new HEFG email account for Sean Miller following promotion to office manager.		
274.	12/12/2019 VPS Quasar auto-renewal notice for HEFG hosting services.		
275.	12/21/2019 Google password reset notice for Omar's account.		
276.	12/27/2019 Namecheap payment receipt for hosting renewal for an HEFG server.		
277.	12/30/2019 Hyper Engine check no. 104 for \$12,500 relating to a Mercedes vehicle lease.		
278.	1/9/2020 Hyper Engine check no. 105 for \$117,152.03, signed by		

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	Roxanne, relating to a Tesla vehicle purchase.		
279.	1/23/2020 email thread regarding Hyper Engine/HEFG public-relations launch and PMK press.		
280.	1/30/2020 email summarizing an HEFG/Hyper Engine team meeting regarding websites, public relations, Black History in Two Minutes, and PMK.		
281.	2/3/2020 Google Workspace notice of password reset for the “Michael” account performed by administrator Angelone.		
282.	3/3/2020 email from Roxanne regarding late payments and requesting that Darrick pause while Deon addresses outstanding amounts.		
283.	3/6/2020 email from AONE demanding past-due		

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	payments and attaching invoices for HEFG-related costs.		
284.	4/21/2020 email from Deon directing Darrick to lead Robert F. Smith digital and social media management with Terakeet.		
285.	4/24/2020 email regarding status of and payments on January–March 2020 invoices for HEFG, Be Woke, and Black History in Two Minutes, including staffing impacts.		
286.	5/1/2020 audio recording of discussion between Deon and Darrick regarding digital film campaign concepts.		
287.	5/7/2020 audio recording of discussion between Deon and Darrick regarding use of automation tools for online voting.		
288.	5/7/2020 audio recording of discussion between Deon and Darrick regarding a		

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	\$4,000 budget for a paid campaign relating to Robert's nomination.		
289.	6/8/2020 First Amended Complaint in Phifer v. Deon Taylor et al., Sacramento action alleging breach of contract and related claims.		
290.	7/1/2020 email from AONE demanding payment of outstanding Black History in Two Minutes, HEFG, and Be Woke invoices, G Suite charges, domain costs, and advertising spend reimbursements.		
291.	7/7/2020 email transmitting a Hyper Engine digital marketing strategy deck for the Work Vineyard project to Lamya.		
292.	7/17/2020 email regarding notice of a bounced check and request for replacement wire payment from HEFG.		
293.	7/22/2020 audio recording in which Roxanne describes the		

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	Be Woke project setup, introduces Erin Harris, and asks Darrick to assemble a campaign team.		
294.	8/4/2020 email from Darrick to Lamya describing Hyper Engine as a joint venture with Roxanne and partners for the Work Vineyard project.		
295.	8/5/2020 fully executed Work Vineyard social and digital services agreement between Lamya and Angelone on behalf of Hyper Engine.		
296.	8/15/2020 Namecheap order confirmation for auto-renewal of bewoke.vote and woke.vote domains billed to AONE.		
297.	8/23/2020 audio recording of discussion in which Deon directs launch of the Be Woke “Kennedy” campaign with Darrick handling digital operations and budget.		

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298.	9/2/2020 email from BLOC campaign counsel Littman regarding issues raised about commitments and Facebook group use by Deon and Hyper Engine.		
299.	9/20/2020 email from Pauline Fischer introducing Darrick to BRON as a Be Woke co-founder and partner of Deon and Roxanne.		
300.	10/27/2020 Namecheap receipt showing hosting payment for hiddenempirefilmgroup.com made by Angelone.		
301.	10/31/2020 email thread regarding Hawkfish engagement terms, fees, and donor messaging.		
302.	10/31/2020 email with Hawkfish statement of work and media plan for national campaign involving HEFG/Hyper Engine.		
303.	11/1/2020 email exchange		

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	among executives regarding Hawkfish engagement and sponsor communications.		
304.	11/10/2020 Namecheap auto-renewal notice for deontaylor.com, deontaylorfilms.com, and hiddenempirefilms.com billed to Angelone.		
305.	11/10/2020 executed master services agreement between Lionsgate and Hyper Engine for creative and marketing services.		
306.	11/10/2020 email discussing active HEFG/Be Woke/BHITM projects and web, social, and marketing priorities.		
307.	11/10/2020 email from Hawkfish representative Andrea Gellert regarding creative content and campaign metrics.		
308.	11/12/2020 email from Angelone providing BHITM cost and invoice breakdown,		

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	including work, audiences, and balances.		
309.	11/12/2020 email from Roxanne Taylor to Bank of the West requesting closure of a Hyper Engine account associated with Angelone.		
310.	11/27/2020 Namecheap receipt reflecting renewal payment for hiddenempirefilmgroup.com hosting charged to Angelone.		
311.	12/7/2020 email attaching Hyper Engine/Be Woke statement of work outlining scope, rates, and reimbursement terms.		
312.	12/10/2020 audio recording of discussion between Deon Taylor and Angelone regarding influencer Karesh and next steps on a campaign.		
313.	12/11/2020 email documenting Erin Harris's password reset request and		

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	Angelone's assistance.		
314.	12/15/2020 Hyper Engine Invoice No. 1232 to Lionsgate in the amount of \$165,000 for Fatale campaign marketing services.		
315.	12/16/2020 email introducing Angelone as "head of digital" operating Hyper Engine, described as the digital arm of Hidden Empire, to Ciroc/Lionsgate partners.		
316.	12/23/2020 email and attached report summarizing Hyper Engine Fatale influencer campaign performance circulated to HEFG and Lionsgate recipients.		
317.	1/1/2021 audio recording in which Deon Taylor asks Angelone to upload a campaign video and references difficulty accessing an account.		

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1	318.	1/6/2021 email discussing		
2		BHITM payments, budget		
3		approval, and feedback from		
4		Dyllan McGee regarding		
5		digital rollout.		
6	319.	2/8/2021 email setting out		
7		annual BHITM/Hyper		
8		Engine operating budget,		
9		including monthly ranges		
10		and approximately 39		
11		domains and related digital		
12		assets.		
13	320.	2/8/2021 email exchange		
14		between Roxanne Taylor and		
15		Angelone regarding BHITM		
16		margins, costs, domains, and		
17		social media management.		
18	321.	2/22/2021 audio recording of		
19		Deon Taylor discussing		
20		BHITM finances, Robert F.		
21		Smith funding, and		
22		compensation for Angelone.		
23	322.	2/24/2021 email from Deon		
24		Taylor forwarding a Robert		
25		F. Smith Google Alert to		
26		Angelone and requesting		
27		client-related handling.		
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1	323.	3/1/2021 email from		
2		Angelone to Roxanne Taylor		
3		regarding past-due amounts		
4		and request for a complete		
5		invoice list.		
6	324.	3/1/2021 email and invoice		
7		concerning Work Vineyard		
8		billing, including Hyper		
9		Engine invoices to Lamya		
10		and comments on project		
11		profitability.		
12	325.	3/12/2021 email from		
13		Roxanne Taylor to CPA		
14		regarding Hyper Engine		
15		operating agreement		
16		membership and ownership		
17		structure.		
18	326.	3/17/2021 email from		
19		Roxanne Taylor directing		
20		Angelone to create a HEFG		
21		email account for new COO		
22		Quincy Newell and assist		
23		with onboarding.		
24	327.	3/17/2021 email introducing		
25		Quincy Newell as COO and		
26		requesting Angelone's		
27		assistance with IT		
28		integration and workflow.		

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1	328.	3/19/2021 email exchange		
2		regarding BHITM terms,		
3		including communications		
4		with McGee Media and		
5		client payment		
6		arrangements.		
7	329.	3/23/2021 weekly		
8		HEFG/Hyper Engine staff		
9		recap email covering THND,		
10		CLIMB, BHITM, newsletter,		
11		social media, and		
12		e-commerce items.		
13	330.	3/26/2021 Hyper Engine		
14		2021 company presentation		
15		deck listing Angelone as		
16		CTO, Roxanne Taylor as		
17		CEO, Deon Taylor as CCO,		
18		and describing client		
19		portfolio.		
20	331.	4/2/2021 email from Quincy		
21		Newell requesting		
22		information from Angelone		
23		on Hyper Engine team		
24		members and resources for		
25		upcoming projects.		
26	332.	4/4/2021 email and		
27		organizational chart from		
28		Angelone to Quincy Newell		

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	providing AOne team breakdown and digital asset list, including domains, brands, social accounts, and CMS access.		
333.	4/7/2021 email with updated Hyper Engine deck reflecting branding and marketing language incorporating edits from Roxanne Taylor.		
334.	4/8/2021 “Climb” vaccine campaign presentation deck describing budget (approximately \$1.01 million), target markets, deliverables, and HEFG/Hyper Engine team roles.		
335.	4/22/2021 THND working budget Google Sheet shared with Angelone, outlining digital and creative budget line items.		
336.	4/22/2021 email circulating THND budget, calendar, and timeline to HEFG and studio participants with reference to		

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	digital and social planning.		
337.	4/26/2021 email from Angelone to Quincy, Roxanne, and Deon Taylor transmitting THND digital roadmap and proposed budget.		
338.	5/6/2021 THND/MTB2 marketing meeting agenda listing attendees including Angelone and studio marketing personnel.		
339.	5/19/2021 audio recording of Deon Taylor dictating BHITM Webby Awards social media post content and addressing the team.		
340.	5/21/2021 audio recording of Deon Taylor providing Danny Trejo contact information to Angelone for THND promotional outreach.		
341.	5/21/2021 audio recording of Deon Taylor providing King Bach contact information to Angelone for THND digital		

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1		promotion.		
2	342.	5/22/2021 audio recording of		
3		Deon Taylor discussing		
4		influencer outreach and paid		
5		collaborations for campaign		
6		activity with Angelone.		
7	343.	5/31/2021 email exchange		
8		regarding potential THND		
9		media buy on Pornhub and		
10		discussion of how the media		
11		source would be described.		
12	344.	5/31/2021 email from		
13		Angelone referencing THND		
14		exhibitor creative and prior		
15		plans in response to the		
16		proposed Pornhub		
17		advertising.		
18	345.	5/31/2021 email and		
19		associated creative materials		
20		in which Hyper Engine		
21		sends THND exhibitor		
22		graphic and Lionsgate		
23		confirms the graphic		
24		originated from		
25		HEFG/Hyper Engine.		
26	346.	6/4/2021 email from		
27		publicist Shandra identifying		
28				

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	Hyper Engine staff as “Partners: Deon, Roxanne, Darrick” for IMDb purposes and discussing timing with Roxanne.		
347.	6/8/2021 THND/MTB2 June 8 campaign meeting agenda including studio PR, social media, talent, and Angelone among participants.		
348.	6/14/2021 audio recording of Deon Taylor describing Angelone’s role in campaigns and discussing adaptation to studio protocols.		
349.	6/21/2021 email between Velma and Roxanne Taylor discussing potential removal of AOne/Robert Smith from the Hyper Engine operating agreement.		
350.	7/6/2021 email from Angelone summarizing requested payments for approximately \$36,000 in ad spend, \$7,000 Duval event cost, and \$2,000 Work		

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	Vineyard cost, with supporting invoices and screenshots attached.		
351.	7/13/2021 email from Quincy Newell to Darrick Angelone regarding strategy for the film “Survivor” and potential Hyper Engine support.		
352.	7/29/2021 HEFG weekly team meeting notes identifying Damon Wolf as FEAR marketing lead and listing Darrick Angelone on the strategy team.		
353.	8/2/2021 email chain regarding coordination of FEAR social channel launch among Damon Wolf, Darrick Angelone, Deon Taylor, and Roxanne Taylor, including timing with public-relations activities.		
354.	8/3/2021 email from Darrick Angelone transmitting a consolidated invoice list for THND, HEFG, Work Vineyard, BHITM, Be		

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	Woke, CLIMB, server, Google Workspace, and domain charges.		
355.	8/4/2021 email regarding FEAR social launch plan involving Shandra, Shawn, and Darrick Angelone, including social-media strategy and feedback.		
356.	8/6/2021 emails and receipts reflecting Namecheap registrations of multiple “hiddenempire” and related project domains by AOne.		
357.	8/7/2021 email from Roxanne Taylor circulating a draft FEAR landing page to Damon Wolf, Darrick Angelone, Deon Taylor, and Quincy Newell for review.		
358.	8/9/2021 email from Velma directing Darrick Angelone to reset Michael Claps’s email account password.		
359.	8/9/2021 email thread in which Roxanne Taylor directs forwarding of		

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	Michael Claps's email to her account and Darrick Angelone implements the forwarding.		
360.	8/17/2021 email regarding setup of support@climborganization.org Google Workspace account by Darrick Angelone for the CLIMB project.		
361.	8/22/2021 email from Roxanne Taylor to Darrick Angelone requesting assistance with logging in to her Instagram account.		
362.	9/2/2021 FEAR release planning email chain including Darrick Angelone, HEFG executives, and distributors regarding digital and creative campaign plans.		
363.	9/7/2021 email from Roxanne Taylor acknowledging partial payment of invoices, requesting confirmation of the invoice list, and		

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	scheduling a budget meeting with Deon Taylor.		
364.	9/7/2021 email from Darrick Angelone transmitting unpaid invoices for HEFG, THND, Work Vineyard, BHITM, FEAR, Google Workspace, server, and domain services.		
365.	9/7/2021 email documenting a password reset for Sean Miller's Google Workspace account and his confirmation of access.		
366.	9/7/2021 packet of invoices attached to email, including BHITM, FEAR, HEFG monthly, Work Vineyard, THND, Google Workspace, and domain invoices.		
367.	9/7/2021 Google administrative log entry reflecting an administrator password reset on Sean Miller's account by Darrick Angelone.		
368.	9/13/2021 audio recording of		

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	Deon Taylor and Darrick Angelone discussing a Be Woke campaign plan for Denver, including references to Don Cheadle and Chauncey Billups.		
369.	9/30/2021 email from Darrick Angelone distributing a FEAR cast social-media toolkit and posting instructions.		
370.	10/4/2021 email invitation for a FEAR weekly marketing Zoom meeting listing Darrick Angelone, Quincy Newell, and other marketing participants.		
371.	10/6/2021 audio recording of Deon Taylor asking Darrick Angelone to create a Forbes-style meme or headline for Robert F. Smith.		
372.	10/6/2021 audio recording providing additional detail regarding the requested Robert F. Smith meme or headline.		

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1	373.	10/11/2021 email from		
2		Kirkland & Ellis partner		
3		Sarkis Jebejian to Darrick		
4		Angelone regarding delivery		
5		of BHITM video materials.		
6	374.	10/14/2021 email chain		
7		concerning vaccine		
8		campaign creative materials,		
9		including circulation of		
10		“Truth” videos and		
11		identification of target states.		
12	375.	10/14/2021 audio recording		
13		of Deon Taylor discussing		
14		episode status for a		
15		campaign with Darrick		
16		Angelone and Roxanne		
17		Taylor and referencing		
18		payment issues.		
19	376.	10/18/2021 agenda for a		
20		CNBC vaccine public-		
21		service-announcement call		
22		outlining BHITM, Hyper		
23		Engine, and HEFG		
24		deliverables and creative		
25		plan.		
26	377.	10/18/2021 email from		
27		Darrick Angelone discussing		
28		Hyper Engine performance,		

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	alignment, and his role in managing the business.		
378.	10/19/2021 audio recording of Deon Taylor requesting a John Lewis film-related meme or headline featuring Deon Taylor and HEFG.		
379.	10/19/2021 audio recording providing additional instructions regarding the John Lewis film meme, including headline and image details.		
380.	10/27/2021 Namecheap receipt showing renewal payment by Darrick Angelone for hosting of hiddenempirefilmgroup.com.		
381.	11/16/2021 audio recording of Deon Taylor asking Darrick Angelone to allocate advertising budget to promote links concerning Robert F. Smith.		
382.	11/18/2021 recurring calendar invitation for FEAR weekly marketing Zoom		

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	meetings including Darrick Angelone, Roxanne Taylor, Deon Taylor, and Damon Wolf.		
383.	11/27/2021 Namecheap receipt reflecting additional hosting renewal payment by Darrick Angelone for hiddenempirefilmgroup.com.		
384.	11/29/2021 email from Darrick Angelone transmitting a Fear Game and NFT pitch deck to Deon Taylor, Omar Joseph, Quincy Newell, and Roxanne Taylor.		
385.	11/29/2021 group audio recording discussing a Meet the Blacks NFT project and requested terms and setup.		
386.	12/1/2021 calendar invitation for a FEAR weekly marketing Zoom meeting listing Darrick Angelone and other participants.		
387.	12/30/2021 email and		

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	attached contract regarding the CNBC vaccine education campaign, including execution details sent to Darrick Angelone.		
388.	1/13/2022 email from Darrick Angelone to Damon Wolf, Omar Joseph, Deon Taylor, and Roxanne Taylor outlining a FEAR “viral activation” concept, including Instagram filter and TikTok ideas.		
389.	1/15/2022 email from Damon Wolf responding to and endorsing Darrick Angelone’s FEAR activation concepts.		
390.	1/17/2022 email from Roxanne Taylor confirming agency engagement for FEAR and stating that campaign costs require her prior budget approval.		
391.	1/19/2022 email and statement of work from Darrick Angelone providing a 2022 cost breakdown for		

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	Google Workspace, domains, servers, social media, and digital marketing services for HEFG.		
392.	1/20/2022 email in which Darrick Angelone labels FEAR activation, NFT, and game materials as “KEEP CONFIDENTIAL.”		
393.	1/24/2022 email describing FEAR Instagram filter shoot logistics and coordination of cast content among Darrick Angelone, Omar Joseph, and Roxanne Taylor.		
394.	1/30/2022 loan documentation reflecting a \$25,000 AOne loan secured by \$100,000 collateral subsequently lost in lender bankruptcy.		
395.	1/30/2022 iMessage thread among Darrick Angelone, Deon Taylor, and Omar Joseph discussing budgets, timing, creative elements, and advertising spend for the FEAR game and film.		

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1	396.	1/31/2022 email from		
2		Darrick Angelone to HEFG		
3		providing a complete invoice		
4		summary through 2021 and		
5		identifying outstanding		
6		balances.		
7	397.	2/11/2022 audio recording of		
8		Deon Taylor explaining that		
9		CNBC campaign work is		
10		delayed due to client		
11		approvals rather than actions		
12		by Darrick Angelone.		
13	398.	2/12/2022 audio recording of		
14		Deon Taylor asking Darrick		
15		Angelone for assistance		
16		configuring email on a new		
17		iPhone.		
18	399.	2/15/2022 Hyper Engine		
19		strategy deck and proposal		
20		for Pathways, including		
21		digital, creative, and key		
22		performance indicator plans.		
23	400.	2/21/2022 email from		
24		Darrick Angelone		
25		introducing attorney Darrell		
26		Thompson to Deon Taylor,		
27		Roxanne Taylor, and Quincy		
28		Newell regarding Hyper		

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	Engine partnership issues.		
401.	2/22/2022 press release announcing partnership among Hyper Engine, Reach TV, and Black History in Two Minutes.		
402.	2/26/2022 audio recording of discussion regarding a proposed Zoom/FaceTime meeting about the FEAR game/film and related communications involving Quincy and counsel.		
403.	2/28/2022 email from Darrick Angelone circulating FEAR digital and creative concepts, including proposed campaign budget and allocation.		
404.	3/2/2022 email thread regarding follow-up FEAR marketing discussions identifying Darrick Angelone as digital and creative lead.		
405.	3/16/2022 email from Velma requesting creation of		

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	accounting@hiddenempirefil mgroup.com Workspace account for Barbara.		
406.	3/16/2022 email confirming setup of the accounting@hiddenempirefil mgroup.com Workspace account for Barbara.		
407.	3/20/2022 complaint in Chris Cobb v. Hidden Empire and Deon Taylor asserting claims relating to alleged implied contract, conversion, and misrepresentation concerning creative work.		
408.	3/24/2022 audio recording in which Deon Taylor discusses an in-person Los Angeles meeting to review creative and web projects and having Darrick lead onboarding.		
409.	3/29/2022 email from counsel to Roxanne Taylor regarding nonpayment on the Be Woke Vote trademark matter and potential default.		
410.	3/31/2022 email from		

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	Darrick Angelone to Omar providing headshot and biography in connection with FEAR Game partnership development.		
411.	4/2/2022 audio recording in which Deon Taylor comments on BHITM video work and recommends paid posting on Facebook, referencing Darrick's role.		
412.	4/8/2022 email from Darrick Angelone requesting formalization of AOne/Hyper Engine joint venture terms and related business arrangements.		
413.	4/8/2022 audio recording in which Deon Taylor characterizes Hyper Engine as a banner and references AOne providing underlying technology services.		
414.	4/8/2022 audio recording continuing discussion of structural and organizational steps needed for Hyper Engine.		

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1	415.	4/8/2022 audio recording in		
2		which Deon Taylor discusses		
3		financing Hyper Engine,		
4		payments to Darrick and		
5		team, and AOne's role in		
6		providing technology.		
7	416.	4/21/2022 email from		
8		Darrick to Quincy, copied to		
9		Deon and counsel,		
10		transmitting a FEAR		
11		digital-marketing agreement		
12		and plan.		
13	417.	4/25/2022 email from		
14		Darrick to Roxanne		
15		regarding server credentials		
16		and related security		
17		requirements referenced for		
18		insurance purposes.		
19	418.	4/26/2022 email from		
20		Darrick to Roxanne		
21		providing additional server		
22		access instructions and		
23		security clarifications.		
24	419.	4/26/2022 audio recording in		
25		which Deon Taylor		
26		congratulates Darrick on an		
27		award and seeks his views		
28		on competing companies and		

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1		marketing.		
2	420.	4/27/2022 web printout from		
3		a Robert F. Smith website		
4		listing Darrick Angelone as		
5		co-founder and creative		
6		director of Be Woke Vote.		
7	421.	5/3/2022 email from Darrick		
8		to HEFG stating that further		
9		work will pause until		
10		approximately 18 months of		
11		past-due balances are		
12		addressed.		
13	422.	5/3/2022 email from		
14		Roxanne and Quincy		
15		acknowledging the need to		
16		pause AOne services and		
17		requesting a meeting to		
18		discuss reduced scope.		
19	423.	5/3/2022 audio recording in		
20		which Deon Taylor discusses		
21		the absence of a signed Fear		
22		game agreement and the		
23		need for IP diligence.		
24	424.	5/3/2022 audio recording in		
25		which Deon Taylor describes		
26		Darrick's internal		
27		involvement with the movie		
28				

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	and emphasizes due diligence before launch.		
425.	5/3/2022 audio recording in which Deon Taylor addresses Darrick's tone regarding Aisha Tyler and emphasizes team alignment before public releases.		
426.	5/18/2022 audio recording in which Deon Taylor expresses interest in resuming work with Darrick and proposes an in-person planning meeting for the next campaign.		
427.	5/23/2022 email from Darrick outlining upcoming domain and server expirations and warning of potential data loss absent payment or transfer arrangements.		
428.	5/23/2022 iMessage thread between Deon and Darrick regarding Fear Game planning, including game and IP strategy.		

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1	429.	5/24/2022 email chain		
2		involving Skadden attorney		
3		Glen Mastroberte regarding		
4		Fear Game partnership terms		
5		and IP/rights negotiations.		
6	430.	5/24/2022 audio recording in		
7		which Deon Taylor		
8		characterizes the dispute as		
9		contractual, referencing		
10		unpaid invoices and asset		
11		issues, and calling for an		
12		agreement before game		
13		release.		
14	431.	6/4/2022 email from Damon		
15		Wolf discussing the value of		
16		AOne's contributions to		
17		campaigns and addressing		
18		resolution of a dispute.		
19	432.	6/23/2022 recurring calendar		
20		invitation for HEFG		
21		bi-weekly marketing strategy		
22		meeting listing Darrick		
23		among core participants.		
24	433.	6/23/2022 email from		
25		Terakeet regarding		
26		completion of Robert F.		
27		Smith-related work		
28		addressed to Darrick.		

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1	434.	7/11/2022 email from		
2		Roxanne to Darrick		
3		requesting reset of the		
4		“Roxanne asst” Google		
5		Workspace account for a		
6		new assistant.		
7	435.	7/11/2022 Google		
8		notification reflecting		
9		password reset activity for		
10		Roxanne’s assistant account		
11		performed by administrator		
12		Darrick.		
13	436.	7/18/2022 email regarding		
14		continued troubleshooting		
15		for new assistant Kazuko		
16		Golden’s Google account.		
17	437.	7/27/2022 Namecheap		
18		invoice for VPS Quasar		
19		hosting renewal (July–		
20		August 2022) for		
21		hiddenempirefilmgroup.com		
22		billed to AOne.		
23	438.	8/1/2022 email from Deon		
24		acknowledging		
25		approximately three months		
26		of nonpayment and		
27		indicating HEFG is prepared		
28		to address outstanding		

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	invoices.		
439.	8/2/2022 email from Darrick to Sean Miller stating that Google services will be discontinued and offering options for transfer or migration.		
440.	8/2/2022 audio recording in which Deon Taylor confirms sending a wire transfer and discusses FEAR, gaming matters, and passcode handoff.		
441.	8/6/2022 TestFlight email from Apple confirming approval of Fear Game version 1.0.0 for beta testing under the AOne Creative account.		
442.	8/9/2022 email thread introducing attorney JT Fox as new counsel for AOne/Hyper Engine regarding payment and IP issues.		
443.	8/9/2022 email from Deon requesting that AOne cease		

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	using HEFG and partner names and asserting that Darrick does not own related IP.		
444.	8/9/2022 audio recording in which Deon Taylor confirms a wire transfer and again discusses FEAR/game matters and passcode transfer.		
445.	8/18/2022 TestFlight email from Apple confirming approval of Fear Game version 1.2.0 for beta testing.		
446.	8/22–10/7/2022 Google Workspace login logs reflecting successful logins by specified HEFG users during the period of the alleged lockout.		
447.	8/26/2022 email from Terakeet CEO Mac Cummings formally requesting transfer of Robert F. Smith Instagram and related social media assets from AOne.		

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1	448.	8/29/2022 emails		
2		documenting LastPass		
3		credential transfer and		
4		confirmation of Robert F.		
5		Smith social asset handoff		
6		from AOne to Terakeet.		
7	449.	9/5–11/8/2022 Google		
8		support chat transcript with		
9		Roxanne regarding a “rogue		
10		admin,” Workspace		
11		administrator dispute, and		
12		account deletion issues.		
13	450.	9/6–10/11/2022 Google case		
14		41009848 emails notifying		
15		Darrick of admin		
16		suspension, DNS/CNAME		
17		steps, and subsequent		
18		account deletion and		
19		recreation.		
20	451.	9/7/2022 OP Innovate Quote		
21		1420 describing proposed		
22		incident response and		
23		influence-campaign services,		
24		including quoted fee of		
25		\$50,000 and language		
26		referencing “coerce/discredit		
27		Angelone,” prepared before		
28		filing of this action.		

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1	452.	9/7/2022 emails regarding		
2		Roxanne Taylor's instruction		
3		to wire \$25,000 to OP		
4		Innovate and inquiry about		
5		potential cyber-insurance		
6		coverage.		
7	453.	9/12/2022 initial complaint		
8		filed by Hidden Empire Film		
9		Group, Deon Taylor, and		
10		Roxanne Taylor asserting		
11		claims including Computer		
12		Fraud and Abuse Act,		
13		conversion, copyright,		
14		alleged account-access		
15		issues, and FEAR game		
16		intellectual property.		
17	454.	9/15/2022 ex parte		
18		application and proposed		
19		order for temporary		
20		restraining order and order to		
21		show cause re preliminary		
22		injunction concerning		
23		transfer of digital assets and		
24		related relief against AOne.		
25	455.	9/16/2022 order by Judge		
26		Fitzgerald denying		
27		temporary restraining order		
28		and setting order to show		

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	cause re preliminary injunction.		
456.	9/30–10/5/2022 emails between Darrick Angelone, HEFG, and FTI regarding Namecheap domain transfers and descriptions of website-related accounts.		
457.	10/1 and 10/4/2022 Namecheap email confirmations regarding auto-renewal notices and push-domain transfers of specified HEFG-related domains from AOne to Roxanne Taylor.		
458.	10/2–10/4/2022 emails between FTI personnel (including Jordan and Erin) and Darrick Angelone coordinating transfer of domains and social/web assets and confirming completion of transfers.		
459.	10/5/2022 Google Workspace billing notice stating that the subscription was suspended for		

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	non-payment, affecting email service for the Workspace account.		
460.	10/10–11/1/2022 Google Workspace email correspondence regarding deletion of a prior Workspace account, restoration efforts, and instructions to create a new account.		
461.	10/13/2022 declaration of Darrick Angelone describing steps taken to comply with court orders, including transfers of digital assets and technical limitations following the injunction.		
462.	10/13/2022 email and Namecheap order records regarding expiration and renewal options for certain “hiddenempiremedia” domains following communications with HEFG.		
463.	9/8–9/9/2017 iMessage exchanges between Deon Taylor and Darrick		

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	Angelone regarding hiring and onboarding of personnel.		
464.	9/20/2019–11/30/2020 Bank of the West checking-account statements for Hyper Engine LLC reflecting transaction activity, service charges, and signatory information.		
465.	Agreement dated April 26, 2012 between Hidden Empire Film Group and A One Entertainment LLC.		
466.	Hyper Engine LLC Operating Agreement dated March 1, 2018.		
467.	Hyper Engine LLC Operating Agreement dated December 1, 2018.		
468.	Invoices issued by A One Entertainment LLC and/or Defendant Angelone to Hidden Empire Film Group or affiliated entities, dated various dates.		
469.	Rate cards provided to Hidden Empire Film Group		

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	or affiliated entities.		
470.	2018 spreadsheet listing domains and login credentials for Hidden Empire Film Group accounts.		
471.	Email communications between Defendant Angelone and Plaintiff Roxanne Taylor.		
472.	Documents and communications relating to marketing services provided by Defendant Angelone for the film project "Fear."		
473.	Communications between Hidden Empire Film Group personnel and Google Workspace support produced in this action.		
474.	Emails, documents, and communications relating to social-media account management work performed by Defendant Angelone for Hidden Empire Film Group or affiliated or		

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	associated entities.		
475.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Fear,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
476.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Fatale,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
477.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Meet the Blacks,” including communications among		

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	Hidden Empire Film Group personnel and any third-party vendors or partners.		
478.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “The Intruder,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
479.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Traffik,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
480.	Emails, documents, and communications relating to the development, production,		

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1		marketing, or distribution of		
2		the film project “The		
3		Intruder,” including		
4		communications among		
5		Hidden Empire Film Group		
6		personnel and any		
7		third-party vendors or		
8		partners.		
9				
10	481.	Emails, documents, and		
11		communications relating to		
12		the development, production,		
13		marketing, or distribution of		
14		the film project		
15		“Supremacy,” including		
16		communications among		
17		Hidden Empire Film Group		
18		personnel and any		
19		third-party vendors or		
20		partners.		
21				
22	482.	Emails, documents, and		
23		communications relating to		
24		the development, production,		
25		marketing, or distribution of		
26		the project “Black History in		
27		Two Minutes,” including		
28		communications among		
		Hidden Empire Film Group		
		personnel and any		

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	third-party vendors or partners.		
483.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Be Woke Vote,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
484.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Climb Organization,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
485.	Emails, documents, and communications relating to the development, creation, marketing, or distribution of the “Fear Game” or “Fear		

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	NFT” project, including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
486.	Text messages, including audio message recordings, exchanged between Defendant Angelone and Plaintiff Roxanne Taylor.		
487.	Text messages, including audio message recordings, exchanged between Defendant Angelone and Plaintiff Deon Taylor.		
488.	Communications, including emails, text messages, and messages on any platform, between Defendant Angelone and Hidden Empire Film Group representatives relating to access, credentials, permissions, or control of any Hidden Empire Film Group accounts.		
489.	Communications, including		

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	emails and messages on any platform, between Defendant Angelone and Hidden Empire Film Group representatives relating to unpaid invoices, billing disputes, outstanding balances, or payment requests.		
490.	Documents, communications, and metadata records concerning the creation, management, access, or use of any Google accounts created by Defendant Angelone on behalf of Hidden Empire Film Group, including account logs, credential information, and platform activity records.		
491.	Emails, documents, and communications relating to the development, creation, marketing, or distribution of the “Fear Game” or “Fear NFT” project, including communications among		

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	Hidden Empire Film Group personnel and any third-party vendors or partners.		
492.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “The House Next Door: Meet the Blacks,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
493.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Free Agents,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
494.	Emails, documents, and communications relating to the development, production,		

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	marketing, or distribution of the project “Hoop 2,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
495.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Facts Not Politics,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
496.	Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Together We Save Lives,” including communications among Hidden Empire Film Group personnel and any third-party vendors or		

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1		partners.		
2	497.	Emails, documents, and		
3		communications relating to		
4		the development, production,		
5		marketing, or distribution of		
6		the project “Black Chair		
7		Show,” including		
8		communications among		
9		Hidden Empire Film Group		
10		personnel and any		
11		third-party vendors or		
12		partners.		
13				
14	498.	Emails, documents, and		
15		communications relating to		
16		the development, production,		
17		marketing, or distribution of		
18		the project “Black and		
19		Blue,” including		
20		communications among		
21		Hidden Empire Film Group		
22		personnel and any		
23		third-party vendors or		
24		partners.		
25				
26	499.	Emails, documents, and		
27		communications relating to		
28		Defendant Angelone’s		
		management, registration,		
		renewal, configuration, or		

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	control of any domains owned or used by Hidden Empire Film Group LLC.		
500.	Documents, records, and social-media materials or data relating to the promotion of A One Entertainment LLC through Hidden Empire Film Group LLC or any associated entities' social-media accounts.		
501.	Communications, agreements, scope-of-work documents, and related materials concerning Plaintiff's retention of any third-party forensic consulting firm in connection with Defendant Angelone and the dissolution of the business relationship between the parties to this action.		
502.	Emails, text messages, and other communications between Quincy Newell and any party to this action,		

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	including employees, representatives, or affiliates of Hidden Empire Film Group and any related or associated entities, and Defendant Angelone.		
503.	Written declarations, communications, and documents introduced in this action by Lawrence Hinkle.		
504.	Documents, communications, files, and materials relating to the creation, development, hosting, management, access, or operation of the website “lmaocomedyseries.com.”		
505.	Emails, documents, and communications among Darrick, A One Entertainment LLC, and any parties to this action relating to discussions concerning the formation of a digital-marketing company.		
506.	Emails, documents, and communications among		

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	Darrick, A One Entertainment LLC, and any parties to this action relating to Hyper Engine LLC.		
507.	Emails, documents, and communications among Defendant Angelone, A One Entertainment LLC, and any parties to this action relating to terms, drafts, iterations of operating agreements, or negotiations among Defendant Angelone, A One Entertainment LLC, and parties to this action concerning Hyper Engine LLC.		
508.	IRS documents or tax filings relating to Hyper Engine LLC.		
509.	Emails, documents, agreements, and communications between Hidden Empire Film Group and its affiliated entities, Defendant Angelone, A One Entertainment LLC, and Optimad Media LLC relating		

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	to any services, collaborations, payments, marketing activities, or business dealings.		
510.	Emails, messages, and other communications between Velma Sykes and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
511.	Entity-formation records, including articles of organization, certificates, amendments, applications, state filings, correspondence with any Secretary of State, and related documents or communications concerning the formation, registration, or organization of Hyper Engine LLC.		
512.	Presentation decks, drafts, pitch materials, and communications relating to		

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	efforts to pitch Hyper Engine LLC services to entertainment companies, including Sony Pictures Entertainment, Lionsgate Films, and Warner Bros.		
513.	Documents, emails, text messages, drafts, pitch decks, research materials, and other communications evidencing or relating to the development of a COVID-19-related project involving the Coalition of National Black Churches.		
514.	Banking and financial records for Hyper Engine LLC, including account statements, transaction logs, reconciliations, canceled checks, check receipts, wire confirmations, deposit records, withdrawal records, and related financial documentation or communications with banking personnel for accounts opened under		

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	Hyper Engine LLC.		
515.	Documents, notes, minutes, and communications relating to annual Hyper Engine meetings, including meetings held on May 21, 2018; February 4, 2019; and January 30, 2020, and materials reflecting discussions of Hyper Engine's structure, its relationship to Hidden Empire Film Group, project updates, and related action items.		
516.	Invoices, billing statements, and related documents issued by Defendant Angelone to Plaintiffs or any third parties reflecting or accounting for work performed pursuant to, or in connection with, Hyper Engine LLC or entities associated with Hidden Empire Film Group.		
517.	Contracts, agreements, statements of work, and related documents executed		

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	by Defendant Angelone with any third-party individuals or entities that reflect, describe, or account for work performed pursuant to, or in connection with, Hyper Engine LLC.		
518.	Documents, emails, text messages, press releases, marketing materials, written statements, meeting notes, and other communications referring to or describing Defendant Angelone as a partner, member, executive, or principal of Hyper Engine LLC.		
519.	Documents, emails, and communications reflecting discussions among Defendant Angelone and any party to this action concerning Hyper Engine billing, staffing, proposals, project management, future operations, or other business affairs.		
520.	Emails, text messages, and		

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	other communications between Quincy Newell and any party to this action, including employees, representatives, or affiliates of Hidden Empire Film Group and any related or associated entities.		
521.	Documents, drafts, files, presentations, reports, and other materials created, authored, or generated by Quincy Newell on behalf of Hidden Empire Film Group or any associated or related entities.		
522.	Emails, messages, and other communications between Damon Wolf and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
523.	Emails, messages, and other communications between		

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	Omar Joseph and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
524.	Emails, messages, and other communications between Andrew Bachelor and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
525.	Formation or registration documents filed by Defendant Angelone on behalf of Hidden Empire Film Group or any associated entities with the California Secretary of State.		
526.	Emails, messages, and other communications between Robert Smith and any party		

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	to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
527.	Statements, reports, draft reports, accountings, analyses, notes, and other documents created or prepared by any expert witness in this action.		
528.	Responses to written discovery in this action by Deon Taylor, Roxanne Taylor, Hidden Empire Holdings, LLC, or affiliated entities.		
529.	Responses to written discovery in this action by Darrick Angelone, AOne Holdings LLC, or On Chain Innovations, LLC.		
530.	Documents and communications relating to responses to written discovery in this action by		

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	Darrick Angelone, AOne Holdings LLC, or On Chain Innovations, LLC.		
531.	Materials furnished by Aprio pursuant to any subpoena issued in this action.		
532.	Materials furnished by AT&T pursuant to any subpoena issued in this action.		
533.	Materials furnished by BCOUNTS4YOU pursuant to any subpoena issued in this action.		
534.	Materials furnished by Bank of the West pursuant to any subpoena issued in this action.		
535.	Materials furnished by BPM LLP pursuant to any subpoena issued in this action.		
536.	Materials furnished by Charter Communications pursuant to any subpoena issued in this action.		
537.	Materials furnished by City		

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	National Bank pursuant to any subpoena issued in this action.		
538.	Materials furnished by Frontier Communications pursuant to any subpoena issued in this action.		
539.	Materials furnished by Google pursuant to any subpoena issued in this action.		
540.	Materials furnished by McGee Media pursuant to any subpoena issued in this action.		
541.	Materials furnished by Meta pursuant to any subpoena issued in this action.		
542.	Materials furnished by Suzanne Summerville pursuant to any subpoena issued in this action.		
543.	Materials furnished by Quincy Newell pursuant to any subpoena issued in this action.		
544.	Materials furnished by		

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	Verizon pursuant to any subpoena issued in this action.		
545.	Materials furnished by Work Vineyard pursuant to any subpoena issued in this action.		
546.	Emails, messages, and other communications between Barbara Campbell and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.		
547.	Deposition transcripts of all parties deposed by Defendants in this action.		
548.	Namecheap account records and domain transfer logs for Hidden-Empire-related domains produced pursuant to subpoena in this action.		
549.	Any and all documents relied upon by Defendants'		

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	expert Rick Watts in forming his opinions.		
550.	February 17, 2024 labor-law judgment entered against Roxanne Taylor in favor of Naomi Leslie in the amount of \$300,573.51; referenced in Roxanne Taylor deposition (9/10/2025).		
551.	Transcript excerpt pages 207–208 from Roxanne Taylor deposition (09/10/2025) discussing the Naomi Leslie labor judgment.		
552.	June 5, 2024 Statement of Information for MEET THE BLACKS LLC (Entity No. 201414810412) signed by Velma Sykes (SOI File No. BA20241089979).		
553.	June 5, 2024 Statement of Information for STRANDED LLC (Entity No. 201611210280) signed by Velma Sykes (SOI File No. BA20241090027).		

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554.	June 5, 2024 Statement of Information for FREE AGENTS THE MOVIE LLC (Entity No. 202006010218) signed by Velma Sykes (SOI File No. BA20241090082).		
555.	June 5, 2024 Statement of Information for FATALE, LLC (Entity No. 201812210538) signed by Velma Sykes (SOI File No. BA20241090164).		
556.	June 5, 2024 Statement of Information for HYPER ENGINE, LLC (Entity No. 201807410500) signed by Velma Sykes (SOI File No. BA20241090301).		
557.	June 26, 2024 Statement of Information for AVENT PRODUCTIONS LLC (Entity No. 201422410318) signed by Velma Sykes (SOI File No. BA20241205635).		
558.	July 10, 2024 Statement of Information for HIDDEN EMPIRE FILMS, LLC		

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	(Entity No. 202251711787) signed by Erika Easter (SOI File No. BA20241276613).		
559.	August 12, 2024 Statement of Information for HOOP 2 FILM LLC (Entity No. 201421610281) signed by Velma Sykes (SOI File No. BA20241456246).		
560.	June 9, 2025 Statement of Information for HIDDEN EMPIRE HOLDINGS, LLC (Entity No. 202117910005) signed by Erika Easter (SOI File No. BA20251252060).		

Dated: December 1, 2025

NEWELL LAW GROUP PC

By: /s/ Felton Newell
FELTON T. NEWELL
CHRISTINE SAID
Attorneys for Plaintiffs and Counter-
Claim Defendants HIDDEN EMPIRE
HOLDINGS, LLC; HYPER ENGINE,
LLC and DEON TAYLOR; and Third-
Party Defendant ROXANNE TAYLOR

Dated: December 1, 2025

KRAMER, DEBOER & KEANE

By: /s/ Sandra Calin
SANDRA CALIN
Attorneys for Defendants DARRICK

ANGELONE, AONE CREATIVE,
LLC and ON CHAIN INNOVATIONS,
LLC

Dated: December 1, 2025

LAW OFFICES OF JT FOX, APC

By: /s/ J.T. Fox

J.T. FOX

JUSTIN KIAN

Attorneys for Defendants DARRICK
ANGELONE, AONE CREATIVE,
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